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8 DFSB Kollektive Co. Ltd.

9  
10 UNITED STATES DISTRICT COURT  
11 CENTRAL DISTRICT OF CALIFORNIA  
12

13 DFSB KOLLECTIVE CO. LTD., a  
Korean corporation;

14 Plaintiff,

15 vs.

16 CJ E&M, INC., a Korean corporation;  
17 CJ E&M AMERICA, INC., a California  
corporation,

18 Defendants.  
19

Case No.

**COMPLAINT FOR DAMAGES  
AND INJUNCTIVE RELIEF FOR:**

**1. COPYRIGHT INFRINGEMENT**

**2. VIOLATION OF THE DIGITAL  
MILLENNIUM COPYRIGHT ACT**

**DEMAND FOR JURY TRIAL**

20  
21 Plaintiff DFSB Kollektive Co. Ltd. alleges as follows:

22 **INTRODUCTION**

- 23 1. DFSB Kollektive Co. Ltd. has exclusive licenses to reproduce,  
24 distribute, publicly perform and publicly display in the United States numerous  
25 works of Korean pop music, which are registered with the U.S. Copyright Office.  
26 2. Without DFSB Kollektive's permission, CJ E&M, Inc. ("CJ E&M")  
27 and CJ E&M America, Inc. ("CJ E&M America") have distributed to the Beats  
28 Music service (a California-based, online music service) these sound recordings. In

1 distributing these works, CJ E&M America, acting primarily from Los Angeles,  
2 knowingly provided false copyright management information with the intent to  
3 facilitate or conceal infringement.

4 3. Furthermore and without DFSB Kollektive's permission, CJ E&M, via  
5 its website www.mnet.com, made available in the United States for distribution  
6 and/or distributed to people within the United States over 300 works to which DFSB  
7 Kollektive—not CJ E&M—has the exclusive right to distribute within the United  
8 States.

9 4. The activities of CJ E&M and CJ E&M America (jointly and severally,  
10 "Defendants") constitute willful copyright infringement and the submission of false  
11 copyright management information in violation of the Digital Millennium Copyright  
12 Act.

13 5. DFSB seeks damages, an injunction, costs and fees.

#### 14 **PARTIES**

15 6. DFSB Kollektive Co. Ltd. is a corporation under the laws of the  
16 Republic of Korea with its principal place of business in Seoul, Korea.

17 7. CJ E&M, Inc. is a corporation under the laws of the Republic of Korea,  
18 with its principal place of business in Seoul, Korea.

19 8. CJ E&M America, Inc. is a California corporation with its principal  
20 place of business in Los Angeles, California.

#### 21 **JURISDICTION AND VENUE**

22 9. The Court has jurisdiction over the subject matter pursuant to 28 U.S.C.  
23 § 1331 (federal question) and 28 U.S.C. § 1338(a) (copyright).

24 10. The Court has personal jurisdiction over Defendants either because  
25 they are headquartered here (CJ E&M America) or because, upon information and  
26 belief, they purposefully directed their wrongful activities to this jurisdiction,  
27 including by distributing infringing sound recordings to residents of California and  
28 by distributing or conspiring to distribute false copyright management information

1 in California (CJ E&M).

2 11. Pursuant to 28 U.S.C. § 1391(b) and § 1400(a), venue is proper because  
3 a substantial part of the events and omissions giving rise to the claims herein  
4 occurred in this district, the wrongdoing alleged herein was directed toward this  
5 district and all defendants reside in and/or are subject to personal jurisdiction in this  
6 district. Further, the claims herein arise out of Defendants' forum-related activities,  
7 and the exercise of jurisdiction here would be reasonable.

8 12. The Korea Creative Content Agency, a South Korean government  
9 agency focusing on cultural exports, has indicated its support for Korean companies  
10 to pursue legal actions in the United States that seek to stop the illegal, online  
11 distribution of Korean music to the United States.

12 **FACTUAL ALLEGATIONS**

13 **DFSB Kollektive Has an Exclusive License to Certain Works in the U.S.**

14 13. DFSB Kollektive has the exclusive right to reproduce, distribute,  
15 publicly perform and publicly display certain sound recordings within the United  
16 States. DFSB Kollektive has also been assigned the exclusive right to pursue causes  
17 of action for infringement that have accrued in favor of the copyright owners of  
18 these works.

19 14. These works are registered with the U.S. Copyright Office.

20 15. 303 of these works and their copyright registration numbers are listed  
21 in Exhibit 1.

22 16. DFSB Kollektive has assigned an International Standard Recording  
23 Code ("ISRC") to each of the works and a Universal Product Code ("UPC") to their  
24 albums.

25 17. UPC is a unique identifier for an album.

26 18. ISRC is an identifier for sound recordings that consists of 12  
27 characters. Each ISRC is a unique, permanent identifier for a specific recording.  
28 Only one ISRC should be assigned to a track, and an ISRC should never represent

1 more than one unique recording.

2 19. ISRCs are obtained from the International Federation of the  
3 Phonographic Industry, which acts as an international ISRC agency. It is located in  
4 London.

5 20. The International Federation of the Phonographic Industry has given  
6 permission to DFSB Kollektive to assign ISRC codes to recordings on behalf of  
7 DFSB Kollektive's customers. DFSB Kollektive is an "ISRC Manager," which  
8 means that the International Federation of the Phonographic Industry allows DFSB  
9 Kollektive to assign ISRCs to recordings that DFSB Kollektive did not create, on  
10 behalf its clients.

11 21. Defendants are not ISRC Managers. The International Federation of  
12 the Phonographic Industry has not granted Defendants the right to assign ISRC  
13 codes to recordings that they do not own. Consequently, Defendants should not be  
14 assigning new ISRC codes to recordings on behalf of third parties.

15 **CJ E&M and CJ E&M America Distribute the DFSB Works in the United**  
16 **States and Obscure Copyright Information for These Works.**

17 22. The Beats Music service ("Beats") is a music streaming service.  
18 Consumers pay a fee to access music, and Beats pays royalties according to the  
19 popularity of songs.

20 23. Beats is available to consumers in the United States but not in South  
21 Korea.

22 24. Record labels and other distributors or licensees of music can upload,  
23 for distribution, songs to Beats via MediaNet Digital, Inc. ("MediaNet"), a Delaware  
24 corporation and digital-music provider with an office in Los Angeles, California.  
25 When distributing music to MediaNet, submitters provide copyright management  
26 information about the recordings, including ISRCs and UPCs.

27 25. Since around 2014, CJ E&M and CJ E&M America have distributed to  
28 MediaNet (and, through MediaNet, for further distribution to the U.S. public) sound



1 recordings, including but not necessarily limited to the nineteen sound recordings by  
2 Swallow and Rhymebus listed on the last two pages of Exhibit 1.

3 26. Neither CJ E&M nor CJ E&M America has rights to distribute these  
4 recordings within the United States. Neither CJ E&M nor CJ E&M America has  
5 copyrights to these sound recordings or the underlying works in the United States.

6 27. CJ E&M and CJ E&M America submitted ISRCs and UPCs, via  
7 MediaNet, to Beats for each of these recordings. These ISRCs and UPCs were  
8 different from the ISRCs and UPCs originally and permanently assigned by DFSB  
9 Kollektive to each of the recordings. A comparison of several ISRCs and UPCs  
10 assigned by DFSB Kollektive and those submitted by CJ E&M and CJ E&M  
11 America to Beats, via MediaNet, is attached as Exhibit 2.

12 28. As a result of the false information submitted by CJ E&M and CJ E&M  
13 America from Los Angeles and elsewhere, Beats incorrectly identifies “CJ E&M” or  
14 another Korean company, Neowiz Internet, as the owner of the copyrights for these  
15 sound recordings and the underlying works. Screenshots for these recordings on  
16 Beats, accessed from Los Angeles, is attached as Exhibit 3. As these screenshots  
17 make clear, “CJ E&M” or Neowiz Internet (written in Korean characters) is  
18 incorrectly identified after the copyright signifiers © and ® for these songs.

19 29. This is not the first time that CJ E&M has altered copyright  
20 management information of digital music. In August 2012, the Seoul Central  
21 District Court (11th Civil Case Division) in South Korea entered a final  
22 judgment against CJ E&M, requiring it to pay 50,000,000 KRW (~\$45,000) for  
23 issuing duplicate ISRCs for digital music content that DFSB Kollektive held  
24 overseas distribution rights to.

25 **Distribution of Songs via WWW.MNET.COM**

26 30. CJ E&M administers and is otherwise responsible for the website,  
27 www.mnet.com (“Mnet”), which sells Korean pop music from its collection of  
28 music files.

1           31. Upon information and belief, CJ E&M has maintained Mnet through an  
2 agreement with Akamai Technologies, an Internet service provider based in  
3 Massachusetts.

4           32. CJ E&M is aware whether a customer who purchases music through  
5 Mnet is from the United States; and CJ E&M makes it easy for U.S. consumers to  
6 download music from its site.

7           33. Mnet has been accessible to US-based customers who can purchase  
8 Korean pop music using U.S. credit cards and pursuant to an English-language user  
9 agreement.

10          34. Mnet has advertised its music services via English-language  
11 commercials accessible to U.S.-based customers.

12          35. Mnet's terms of services indicate that subscribers to Mnet identify to  
13 CJ E&M their physical address.

14          36. In January 2010, the Asian regional office of the International  
15 Federation of the Phonographic Industry issued a notice warning Mnet against  
16 distributing digital music internationally to which it only had domestic rights.

17          37. Nonetheless, through Mnet, CJ E&M has made available in the United  
18 States for sale and/or sold to people within the United States over 300 works,  
19 including but not necessarily limited to those listed in Exhibit 1.

20          38. Neither CJ E&M nor CJ E&M America has rights to distribute these  
21 works to consumers in the United States.

22          39. CJ E&M has priced these works at less than \$0.10 per track to U.S.  
23 consumers and even given away these works for free in the U.S., while DFSB  
24 Kollektive has priced these same works to U.S. consumers via Apple iTunes at  
25 \$0.99 to \$1.29 per track.

26                                   **FIRST CAUSE OF ACTION**  
27                                   **(COPYRIGHT INFRINGEMENT)**

28          40. DFSB Kollektive realleges all of the allegations contained in the

1 preceding paragraphs.

2 41. Defendants, in excess of the scope of any license and without DFSB  
3 Kollektive's permission, have distributed to the U.S. public, have caused the  
4 distribution to the U.S. public, and/or have made available for distribution to the  
5 U.S. public sound recordings to which DFSB Kollektive has exclusive rights,  
6 including those listed in Exhibit 1 (collectively, the "DFSB Works").

7 42. Defendants' acts infringed the copyrights and DFSB's exclusive rights  
8 in violation of 17 U.S.C. §§ 106 and 501.

9 43. Defendants' infringement of DFSB Kollektive's rights in each of the  
10 DFSB Works constitutes a distinct act of infringement.

11 44. Defendants have willfully committed their acts of infringement.

12 45. Defendants have willfully and intentionally conspired, through an  
13 agreement, to commit copyright infringement as outlined in this Complaint. In  
14 furtherance of this conspiracy, Defendants have committed overt acts, including, as  
15 described previously, all of the facts necessary to cause infringement of the DFSB  
16 Works. Each of these acts was made pursuant to the agreement of the Defendants  
17 and in furtherance of their common scheme.

18 46. Pursuant to 17 U.S.C. § 504(c), DFSB Kollektive is entitled to the  
19 maximum statutory damages in the amount of \$150,000 with respect to each work  
20 infringed, or such other amounts as may be proper under 17 U.S.C. § 504(c).  
21 Alternatively, DFSB Kollektive, at its election, is entitled to damages pursuant to 17  
22 U.S.C. § 504(b) for each separate infringement.

23 47. DFSB Kollektive is entitled to its costs, including reasonable attorney's  
24 fees, pursuant to 17 U.S.C. § 505.

25 48. Defendants' conduct has caused, and unless enjoined by the Court,  
26 threatens to continue to cause DFSB Kollektive great and irreparable injury that  
27 cannot fully be compensated or measured in money. DFSB Kollektive has no  
28 adequate remedy at law. Pursuant to 17 U.S.C. § 502, DFSB Kollektive is entitled



1 to preliminary and permanent injunctions prohibiting further infringement of the  
2 copyrights and of DFSB Kollektive's exclusive rights.

3 **SECOND CLAIM FOR RELIEF**

4 **(VIOLATION OF DIGITAL MILLENNIUM COPYRIGHT ACT)**

5 49. DFSB Kollektive realleges all of the allegations contained in the  
6 preceding paragraphs.

7 50. Beginning around 2014, Defendants intentionally committed at least  
8 four acts per infringing work for works to which DFSB Kollektive has exclusive  
9 rights, including the works by Swallow and Rhymebus listed on the last two pages  
10 of Exhibit 1. These acts consisted of: knowingly and with the intent to induce,  
11 enable, facilitate, or conceal infringement by (1) providing/distributing incorrect  
12 International Standard Recording Codes and/or removing/altering the correct ISRCs,  
13 (2) providing/distributing incorrect Universal Product Codes and/or  
14 removing/altering the correct UPCs, (3) providing/distributing incorrect sound  
15 recording copyright notices and/or removing/altering the correct sound recording  
16 copyright notices, and (4) providing/distributing incorrect copyright notices for the  
17 underlying works and/or removing/altering the correct copyright notices for the  
18 underlying works.

19 51. These acts constitute separate violations under 17 U.S.C. § 1202.

20 52. Defendants have willfully and intentionally conspired, through an  
21 agreement, to provide/distribute false copyright management information and to  
22 alter correct copyright management information, as outlined in this Complaint. In  
23 furtherance of this conspiracy, Defendants have committed overt acts, including, as  
24 described previously, submitting inaccurate ISRCs, UPCs and copyright-owner  
25 identifications. Each of these acts was made pursuant to the agreement of the  
26 Defendants and in furtherance of their common scheme.

27 53. Under 17 U.S.C. § 1203(c)(3), DFSB Kollektive is entitled to statutory  
28 damages for a sum of not less than \$2,500 or more than \$25,000 for each violation



1 of 17 U.S.C. § 1202.

2 54. Under 17 U.S.C. § 1203(c)(4), DFSB Kollektive should receive treble  
3 damages because Defendants violated 17 U.S.C. § 1202 within three years after a  
4 final judgment was entered against Defendants for other such violations.

5 55. DFSB Kollektive is entitled to its costs, including reasonable attorney's  
6 fees, pursuant to 17 U.S.C. § 1203(b).

7 **PRAYER FOR RELIEF**

8 WHEREFORE, DFSB Kollektive asks this Court for judgment against  
9 Defendants jointly and severally as follows:

10 1. On Count I:

11 a. For maximum statutory damages in the amount of \$150,000 with  
12 respect to each copyrighted work infringed, or such other amounts as may be proper  
13 pursuant to 17 U.S.C. § 504(c). Alternatively, DFSB Kollektive, at its election, is  
14 entitled to damages pursuant to 17 U.S.C. § 504(b) for each separate infringement.

15 b. For preliminary and permanent injunctions enjoining Defendants  
16 and all persons acting in concert or participation with Defendants, from directly or  
17 indirectly infringing in any manner any of DFSB Kollektive's copyrights and  
18 exclusive rights under copyrights for the works listed in Exhibit 1.

19 c. For DFSB Kollektive's costs in this action, including reasonable  
20 attorney's fees, pursuant to 17 U.S.C. § 505.

21 2. On Count II:

22 a. For maximum statutory damages in the amount of \$25,000 per  
23 violation under 17 U.S.C. § 1202.

24 b. For treble damages pursuant to 17 U.S.C. § 1203(c)(4).

25 c. For DFSB Kollektive's costs in this action, including reasonable  
26 attorney's fees, pursuant to 17 U.S.C. § 1203(b).

27 3. For all counts, that the Court award DFSB Kollektive such other and  
28 further relief as is just and proper.

**JURY DEMAND**

DFSB Kollektive demands a trial by jury on all issues so triable.

DATED: March 6, 2015

BROWNE GEORGE ROSS LLP

Eric M. George

Keith Wesley

Andrew A. August

Jonathan Gottfried

By

  
Jonathan Gottfried

Attorneys for Plaintiff

DFSB Kollektive Co., Ltd.

# **EXHIBIT 1**



Artist/Performer	Track	Album	U.S. Copyright Office Registration Number
Galaxy Express	문 Door	Wild Days	PA0001681363
Galaxy Express	난 아무것도 아님데 I'm Nothing	Wild Days	PA0001681363
Galaxy Express	진짜 너를 위해 You Want It Real	Wild Days	PA0001681363
Galaxy Express	Sharking	Wild Days	PA0001681363
Galaxy Express	As Time Passes, Always Been Good	Wild Days	PA0001681363
Galaxy Express	하우스 오브 페인 House of F*ckups	Wild Days	PA0001681363
Galaxy Express	피리소리 Sound of Piri	Wild Days	PA0001681363
Galaxy Express	Reggae Chicken	Wild Days	PA0001681363
Galaxy Express	Love Is	Wild Days	PA0001681363
Galaxy Express	쌔이 왓츄윙 Say What You Want	Wild Days	PA0001681363
Galaxy Express	요즘 개들은 짓지 않는다 Dogs These Days Do	Wild Days	PA0001681363
Galaxy Express	매일매일 Everyday	Wild Days	PA0001681363
Galaxy Express	빗속의 여인 Lady of the Rainy Day	Wild Days	PA0001681363
Galaxy Express	꿈의 그림자 Dream Shadow	Wild Days	PA0001681363
Galaxy Express	Arkadia	Wild Days	PA0001681363
Galaxy Express	Reverse	Wild Days	PA0001681363
Galaxy Express	떠나는 날 Departure	Wild Days	PA0001681363
Galaxy Express	나의 지구를 지켜줘 Save My World	Wild Days	PA0001681363
Galaxy Express	Jungle The Black (노래방 Karaoke Version)	Wild Days	PA0001681363
Galaxy Express	홀로 이렇게 Alone Like This (Kim Hee Kwon V	Wild Days	PA0001681363
Chang Kiha	싸구려 커피 Cheap Coffee	싸구려 커피 Cheap Coffee - EP	PA0001673489
Chang Kiha	느리게 걷자 Let's Walk Slowly	싸구려 커피 Cheap Coffee - EP	PA0001673489
Chang Kiha	정말 없었는지 Really Not There	싸구려 커피 Cheap Coffee - EP	PA0001673489
Chang Kiha & The Fac	나와 Come Out	없이 산다 Living the Nothing Special	PA0001673480
Chang Kiha & The Fac	아무것도 없잖아 Absolutely Nothing	없이 산다 Living the Nothing Special	PA0001673480
Chang Kiha & The Fac	오늘도 무사히 Have a Safe Day	없이 산다 Living the Nothing Special	PA0001673480

Artist/Performer	Track	Album	U.S. Copyright Office Registration Number
Chang Kiha & The Fac	정말 없었는지 Really Not There	없이 산다 Living the Nothing Special	PA0001673480
Chang Kiha & The Fac	삼거리에서 만난 사람 Connection at the Three	없이 산다 Living the Nothing Special	PA0001673480
Chang Kiha & The Fac	말하러 가는 길 On the Way to Say	없이 산다 Living the Nothing Special	PA0001673480
Chang Kiha & The Fac	나를 받아주오 Accept Me	없이 산다 Living the Nothing Special	PA0001673480
Chang Kiha & The Fac	그 남자 왜 Why That Guy	없이 산다 Living the Nothing Special	PA0001673480
Chang Kiha & The Fac	떠날 한번 잡히십시오 Shall I Grab Your Throat	없이 산다 Living the Nothing Special	PA0001673480
Chang Kiha & The Fac	싸구려커피 Cheap Coffee	없이 산다 Living the Nothing Special	PA0001673480
Chang Kiha & The Fac	달이 차오른다, 가자 The Moon Is Full, Let's Go	없이 산다 Living the Nothing Special	PA0001673480
Chang Kiha & The Fac	느리게 걷자 Let's Walk Slowly	없이 산다 Living the Nothing Special	PA0001673480
Chang Kiha & The Fac	별일 없이 산다 Living the Nothing Special Life	없이 산다 Living the Nothing Special	PA0001673480
Cocore	아무래도 Born to Be Bad	Odor	PA0001673405
Cocore	Love Song	Odor	PA0001673405
Cocore	검은새 Black Bird	Odor	PA0001673405
Cocore	Disco Queen	Odor	PA0001673405
Cocore	4월 April	Odor	PA0001673405
Cocore	Ethyl Alcohol	Odor	PA0001673405
Cocore	돼지우화 Fable of the Pig	Odor	PA0001673405
Cocore	잠수 Diving	Odor	PA0001673405
Cocore	비 오는 밤 Raining Night	Odor	PA0001673405
Cocore	유체이탈 Out of Body Experience	Relax	PA0001673408
Cocore	벚꽃이 타령 Boating Folk Song	Relax	PA0001673408
Cocore	해야 Dear Sun	Relax	PA0001673408
Cocore	황금연못 Golden Pond	Relax	PA0001673408
Cocore	사랑은 황홀경 Ecstatic Love	Relax	PA0001673408
Cocore	Move Yo Ass	Relax	PA0001673408
Cocore	Here Comes the Wave	Relax	PA0001673408

Artist/Performer	Track	Album	U.S. Copyright Office Registration Number
Cocore	Permanent Vacation	Relax	PA0001673408
Cocore	타이페이부중력지하철특급 Taipei Zero Gravity	Relax	PA0001673408
Cocore	Hawaii	Relax	PA0001673408
Cocore	Listen-Repeat	Relax	PA0001673408
Cocore	주기도문 The Lord's Prayer	Relax	PA0001673408
Cocore	귀향 Returning Home	Relax	PA0001673408
Cocore	Hidden Track	Relax	PA0001673408
Crying Nut	서커스 매직 유랑단 Circus Magic Clowns	Circus Magic Clowns	PA0001673487
Crying Nut	신기한 노래 Funny Song	Circus Magic Clowns	PA0001673487
Crying Nut	강변에 서다 Stand On the Riverside	Circus Magic Clowns	PA0001673487
Crying Nut	배짱이 Grasshopper	Circus Magic Clowns	PA0001673487
Crying Nut	다죽자 All Die	Circus Magic Clowns	PA0001673487
Crying Nut	더러운 도시 Dirty City	Circus Magic Clowns	PA0001673487
Crying Nut	군바리 Soldier 230	Circus Magic Clowns	PA0001673487
Crying Nut	탈출기 (바람의 계곡을 넘어...) Escape (Over t	Circus Magic Clowns	PA0001673487
Crying Nut	벗어 Take It Off	Circus Magic Clowns	PA0001673487
Crying Nut	브로드웨이 Broadway AM03:00	Circus Magic Clowns	PA0001673487
Crying Nut	S.F (Science Fiction)	Circus Magic Clowns	PA0001673487
Crying Nut	빨대맨 Straw Man	Circus Magic Clowns	PA0001673487
Crying Nut	게릴라성 집중호우 Guerrilla Rainstorm	Circus Magic Clowns	PA0001673487
Crying Nut	OK 목장의 젖소 Milk Cattle at the OK Corral	Milk Cattle at the OK Corral	PA0001673486
Crying Nut	룩셈부르크 Luxembourg	Milk Cattle at the OK Corral	PA0001673486
Crying Nut	부딪쳐 Smash It	Milk Cattle at the OK Corral	PA0001673486
Crying Nut	명동콜링 Myeong-dong Calling	Milk Cattle at the OK Corral	PA0001673486
Crying Nut	마시자 Let's Drink	Milk Cattle at the OK Corral	PA0001673486
Crying Nut	유원지의 밤 A Night at the Amusement Park	Milk Cattle at the OK Corral	PA0001673486



Artist/Performer	Track	Album	U.S. Copyright Office Registration Number
Crying Nut	뜨거운 안녕 Burning Goodbye	Milk Cattle at the OK Corral	PA0001673486
Crying Nut	물밀의 속삭임 Whisper Under the Water (feat.	Milk Cattle at the OK Corral	PA0001673486
Crying Nut	백수일기 Diary of the Jobless	Milk Cattle at the OK Corral	PA0001673486
Crying Nut	새 Bird	Milk Cattle at the OK Corral	PA0001673486
Crying Nut	My World	Milk Cattle at the OK Corral	PA0001673486
Crying Nut	순이 우주로 Soon! Heading to the Cosmos	Milk Cattle at the OK Corral	PA0001673486
Crying Nut	오줌싸개 Bed-Wetting Generation	Milk Cattle at the OK Corral	PA0001673486
Crying Nut	한낮의 꿈 Daydream	Milk Cattle at the OK Corral	PA0001673486
Crying Nut	감옥으로 부터의 사색 Meditation from Prison	Milk Cattle at the OK Corral	PA0001673486
Crying Nut	튼튼이의 모험 The Adventures of the Strong	Milk Cattle at the OK Corral	PA0001673486
Crying Nut	이소룡을 찾아랏!! Find Bruce Lee!!	Poor Hand Love Song	PA0001673506
Crying Nut	만성피로 Chronic Fatigue	Poor Hand Love Song	PA0001673506
Crying Nut	밤이 깊었네 Oh! What a Shiny Night	Poor Hand Love Song	PA0001673506
Crying Nut	지독한 노래 Vicious Song	Poor Hand Love Song	PA0001673506
Crying Nut	붉은 방 Red Room	Poor Hand Love Song	PA0001673506
Crying Nut	양귀비 The Poppy	Poor Hand Love Song	PA0001673506
Crying Nut	웃기지도 않는 이야기 Not Funny Story	Poor Hand Love Song	PA0001673506
Crying Nut	금환식 Annular Eclipse	Poor Hand Love Song	PA0001673506
Crying Nut	허니 Honey	Poor Hand Love Song	PA0001673506
Crying Nut	불놀이 Fireworks	Poor Hand Love Song	PA0001673506
Crying Nut	코미디의 왕 The King of Comedy	Poor Hand Love Song	PA0001673506
Crying Nut	하수구 Sinkhole	Poor Hand Love Song	PA0001673506
Crying Nut	물샐어 No Clue	Poor Hand Love Song	PA0001673506
Crying Nut	고물 라디오 The Secondhand Radio	Secondhand Radio	PA0001673436
Crying Nut	필살 Offside Deathblow Offside	Secondhand Radio	PA0001673436
Crying Nut	너구리 Raccoon	Secondhand Radio	PA0001673436

Artist/Performer	Track	Album	U.S. Copyright Office Registration Number
Crying Nut	퀵서비스맨 Quick Service Man	Secondhand Radio	PA0001673436
Crying Nut	소크라테스 클럽 Socrates Club	Secondhand Radio	PA0001673436
Crying Nut	오드리 Audrey	Secondhand Radio	PA0001673436
Crying Nut	황금마차 Golden Wagon	Secondhand Radio	PA0001673436
Crying Nut	사랑가 Death Song	Secondhand Radio	PA0001673436
Crying Nut	타이거 당췌!! WTF Tiger	Secondhand Radio	PA0001673436
Crying Nut	Oh My 007	Secondhand Radio	PA0001673436
Crying Nut	양치기 소년의 항해 일지 Shepherd's Logbook	Secondhand Radio	PA0001673436
Crying Nut	개가 말하네 Dog Talks	Secondhand Radio	PA0001673436
Crying Nut	불꽃놀이 Fireworks	Secondhand Radio	PA0001673436
Crying Nut	백구두 White Shoes	Secondhand Radio	PA0001673436
Crying Nut	귀파라미 별곡 Cricket Tune	Secondhand Radio	PA0001673436
Crying Nut	묘비명 Epitaph	Speed Up Losers	PA0001673504
Crying Nut	갈매기 Seagull	Speed Up Losers	PA0001673504
Crying Nut	말 달리자 Speed Up Losers	Speed Up Losers	PA0001673504
Crying Nut	접속 Contact	Speed Up Losers	PA0001673504
Crying Nut	파랑새 Blue Bird	Speed Up Losers	PA0001673504
Crying Nut	검은새 Black Bird	Speed Up Losers	PA0001673504
Crying Nut	펑크걸 Punk Girl	Speed Up Losers	PA0001673504
Crying Nut	요람을 흔드는 돈 The Money That Rocks the C	Speed Up Losers	PA0001673504
Crying Nut	뽀테기 Chrystalises	Speed Up Losers	PA0001673504
Crying Nut	안웃겨 So Not Funny	Speed Up Losers	PA0001673504
Crying Nut	성냥팔이 소녀 Matchstick Girl	Speed Up Losers	PA0001673504
Crying Nut	허리케인 Hurricane	Speed Up Losers	PA0001673504
Crying Nut	싸나이 Tough Guy	Speed Up Losers	PA0001673504
Crying Nut	Crying Nut Song	Uncomfortable Party	PA0001673507

Artist/Performer	Track	Album	U.S. Copyright Office Registration Number
Crying Nut	착한아이 Good Boy	Uncomfortable Party	PA0001673507
Crying Nut	불편한 파티 Uncomfortable Party	Uncomfortable Party	PA0001673507
Crying Nut	Luna	Uncomfortable Party	PA0001673507
Crying Nut	만취친국 Drunken Paradise	Uncomfortable Party	PA0001673507
Crying Nut	비둘기 Dove	Uncomfortable Party	PA0001673507
Crying Nut	귀신은 뭐하나 Ghost MIA	Uncomfortable Party	PA0001673507
Crying Nut	Wake Up	Uncomfortable Party	PA0001673507
Crying Nut	가련나 Leave	Uncomfortable Party	PA0001673507
Crying Nut	가배물어 Coffee Story	Uncomfortable Party	PA0001673507
Crying Nut	Rose Bang	Uncomfortable Party	PA0001673507
Crying Nut	빈자리 Vacancy	Uncomfortable Party	PA0001673507
Crying Nut	생일 축하 Happy Birthday	Uncomfortable Party	PA0001673507
Crying Nut	Gold Rush	Uncomfortable Party	PA0001673507
Demicat	Swingin' With a Cat	Acceptable Range	PA0001673393
Demicat	Walkin' on the Moist Note	Acceptable Range	PA0001673393
Demicat	Strange Romance	Acceptable Range	PA0001673393
Demicat	After Long Night	Acceptable Range	PA0001673393
Demicat	Glow Enclosure	Acceptable Range	PA0001673393
Demicat	Last Train (At Last 12 Remix)	Acceptable Range	PA0001673393
Demicat	Bumpin' With a Cat	Acceptable Range	PA0001673393
Demicat	Chemical Thang (feat. 태완 Taewan)	Acceptable Range	PA0001673393
Demicat	Finicky Billie's Funk	Acceptable Range	PA0001673393
Demicat	No Botherings (feat. 최금비 Choi Guembi)	Acceptable Range	PA0001673393
Demicat	Night and Day	Acceptable Range	PA0001673393
Demicat	Chasin' Traces	Acceptable Range	PA0001673393
Demicat	Strange Romance (Radio Edit)	Acceptable Range	PA0001673393



Artist/Performer	Track	Album	U.S. Copyright Office Registration Number
DJ DOC	Intro (와신상담 Sustained Determination and Pe	The Life...DOC Blues	PA0001673501
DJ DOC	비.愛 Rainy Love (Acoustic Version)	The Life...DOC Blues	PA0001673501
DJ DOC	L.I.E	The Life...DOC Blues	PA0001673501
DJ DOC	Nuclear Lunch the Detect	The Life...DOC Blues	PA0001673501
DJ DOC	포조리 Five-O	The Life...DOC Blues	PA0001673501
DJ DOC	Boogie Night	The Life...DOC Blues	PA0001673501
DJ DOC	Run to You	The Life...DOC Blues	PA0001673501
DJ DOC	기다리고 있어 I'm Waiting	The Life...DOC Blues	PA0001673501
DJ DOC	아무도 모르게 Let Nobody Know	The Life...DOC Blues	PA0001673501
DJ DOC	사랑을 아직도 난 I Don't Know Love	The Life...DOC Blues	PA0001673501
DJ DOC	Someday	The Life...DOC Blues	PA0001673501
DJ DOC	D.O.C Blues	The Life...DOC Blues	PA0001673501
DJ DOC	부익부 빈익빈 The Rich Get Richer and the Poor	The Life...DOC Blues	PA0001673501
DJ DOC	알쏭달쏭 Vague	The Life...DOC Blues	PA0001673501
DJ DOC	Analog	The Life...DOC Blues	PA0001673501
DJ DOC	Alive	The Life...DOC Blues	PA0001673501
DJ DOC	비.愛 Rainy Love	The Life...DOC Blues	PA0001673501
DJ DOC	빼걱빼걱 Creak Creak (Clean Version)	Creak Creak	PA0001674070
DJ DOC	가버려 Go Away	Creak Creak	PA0001674070
DJ DOC	해변으로 가요 Let's Go to the Beach (Pt. 2)	Creak Creak	PA0001674070
DJ DOC	거짓말이야 It's All Lies (Radio Version)	Creak Creak	PA0001674070
DJ DOC	Every Body (Club Version)	Creak Creak	PA0001674070
DJ DOC	무아지경 Complete Absence of Ego	Creak Creak	PA0001674070
DJ DOC	DOC와 춤을 ... Dance with DOC	Creak Creak	PA0001674070
DJ DOC	팔통일기 Idiot's Diary	Creak Creak	PA0001674070
DJ DOC	Seoul Train	Creak Creak	PA0001674070

Artist/Performer	Track	Album	U.S. Copyright Office Registration Number
DJ DOC	Scratch Family	Creak Creak	PA0001674070
DJ DOC	5분 데기조 5 Minute Standby	Creak Creak	PA0001674070
DJ DOC	미안해 I'm Sorry	Creak Creak	PA0001674070
DJ DOC	모르겠어? Don't You Know?	Creak Creak	PA0001674070
DJ DOC	벙글이 Boat Song	Creak Creak	PA0001674070
DJ DOC	마음대로 해 Do What You Wanna Do	Creak Creak	PA0001674070
DJ DOC	빼적빼적 Creak Creak (Instrument)	Creak Creak	PA0001674070
DJ DOC	Outro	Creak Creak	PA0001674070
Dok2	I'm Back	Thunderground	PA0001673478
Dok2	You Don't Know	Thunderground	PA0001673478
Dok2	It's Me (feat. 주영 Joo Young)	Thunderground	PA0001673478
Dok2	Beyond	Thunderground	PA0001673478
Dok2	흔쳐 Rob It (feat. Double K)	Thunderground	PA0001673478
Dok2	64% (feat. Beatbox DG)	Thunderground	PA0001673478
Dok2	마지막 Last (feat. Mr. Gordo)	Thunderground	PA0001673478
Dok2	It's Me (feat. Epik High & MYK)	Thunderground	PA0001673478
EE [Total Art]	EIntro	Imperfect, I'mperfect	PA0001667853
EE [Total Art]	눈코입귀 Eyes, Nose, Mouth, Ears	Imperfect, I'mperfect	PA0001667853
EE [Total Art]	가요 Gayo	Imperfect, I'mperfect	PA0001667853
EE [Total Art]	기억속의 하이칼라 High Coller	Imperfect, I'mperfect	PA0001667853
EE [Total Art]	Same Same	Imperfect, I'mperfect	PA0001667853
EE [Total Art]	Boy	Imperfect, I'mperfect	PA0001667853
EE [Total Art]	Xasquatch	Imperfect, I'mperfect	PA0001667853
EE [Total Art]	Mamie	Imperfect, I'mperfect	PA0001667853
EE [Total Art]	2:22:22	Imperfect, I'mperfect	PA0001667853
EE [Total Art]	Curiosity Kills (Original Version)	Imperfect, I'mperfect	PA0001667853

Artist/Performer	Track	Album	U.S. Copyright Office Registration Number
EE [Total Art]	Monkey Defense (Original Version)	Imperfect, l'imperfect	PA0001667853
EE [Total Art]	Curiosity Kills (Reno Remix)	Imperfect, l'imperfect	PA0001667853
EE [Total Art]	Monkey Defense (UJN Remix)	Imperfect, l'imperfect	PA0001667853
EE [Total Art]	Quit	Imperfect, l'imperfect	PA0001667853
Sister's Barbershop	가장 보통의 존재 Most Ordinary Existence	Most Ordinary Existence	PA0001673513
Sister's Barbershop	너는 악마가 되어가고 있는가? Are You Turnit	Most Ordinary Existence	PA0001673513
Sister's Barbershop	아름다운 것 Beautiful Thing	Most Ordinary Existence	PA0001673513
Sister's Barbershop	작은 마음 Tiny Heart	Most Ordinary Existence	PA0001673513
Sister's Barbershop	외외의 사실 Unexpected Truth	Most Ordinary Existence	PA0001673513
Sister's Barbershop	알리바이 Alibi	Most Ordinary Existence	PA0001673513
Sister's Barbershop	100년 동안의 진심 The Truth Over 100 Years	Most Ordinary Existence	PA0001673513
Sister's Barbershop	인생은 끝물 Life Is a Taboo	Most Ordinary Existence	PA0001673513
Sister's Barbershop	나는 I Am	Most Ordinary Existence	PA0001673513
Sister's Barbershop	산들산들 Gently, Gently	Most Ordinary Existence	PA0001673513
Sister's Barbershop	아름다운 것 Beautiful Thing (Radio Edit)	Most Ordinary Existence	PA0001673513
Plastic People	사거리의 연가 Crossroads Love Song (Intro)	Folk Ya	PA0001676512
Plastic People	공항남녀 Airport Boy and Girl	Folk Ya	PA0001676512
Plastic People	두근거림 Pounding	Folk Ya	PA0001676512
Plastic People	Tomorrow Tomorrow	Folk Ya	PA0001676512
Plastic People	Morning After	Folk Ya	PA0001676512
Plastic People	수도국산 Sudogusan	Folk Ya	PA0001676512
Plastic People	겨울의 선율 Winter Melody	Folk Ya	PA0001676512
Plastic People	동지 Nest	Folk Ya	PA0001676512
Plastic People	구름따라 Following the Cloud	Folk Ya	PA0001676512
Plastic People	달이 그리운 마을 Village That the Moon Draws	Folk Ya	PA0001676512
Plastic People	Chinatown	Folk Ya	PA0001676512



Artist/Performer	Track	Album	U.S. Copyright Office Registration Number
Plastic People	여름의 끝 End of Summer	Folk Ya	PA0001676512
Plastic People	Christmas	Folk Ya	PA0001676512
Plastic People	기우제 Prayer for Rain	Folk Ya	PA0001676512
Plastic People	그늘에 서서 Standing in the Shade	Snap	PA0001673410
Plastic People	우리들의 여름 Our Summer	Snap	PA0001673410
Plastic People	여기저기 Here and There	Snap	PA0001673410
Plastic People	고대하던 일요일 How Soon Is Sunday	Snap	PA0001673410
Plastic People	커피와 담배 Coffee and Cigarettes	Snap	PA0001673410
Plastic People	구름게으름민요 Lazy Cloud Folk Song	Snap	PA0001673410
Plastic People	그래 Indeed	Snap	PA0001673410
Plastic People	노래하는 달 Singing Moon	Snap	PA0001673410
Plastic People	비상 Fly High	Snap	PA0001673410
Plastic People	역사 History	Snap	PA0001673410
Plastic People	흑백사진 Black & White Photo	Snap	PA0001673410
No Brain	Intro	That's Youth	PA0001673491
No Brain	Make It Big	That's Youth	PA0001673491
No Brain	그것이 젊음 That's Youth	That's Youth	PA0001673491
No Brain	Come On! 마산 스트리트여! Come On! Masan	That's Youth	PA0001673491
No Brain	한밤의 뮤직 Midnight Music	That's Youth	PA0001673491
No Brain	웃으니까 얼마나 좋아 Laughter Is Good for You	That's Youth	PA0001673491
No Brain	Rockit Rocket	That's Youth	PA0001673491
No Brain	용과 같이 Like a Dragon	That's Youth	PA0001673491
No Brain	사라져간 나의 별이여 My Fading Star	That's Youth	PA0001673491
No Brain	탈옥 Jailbreak (feat. Dokyo)	That's Youth	PA0001673491
No Brain	검은 날개 Black Wing	That's Youth	PA0001673491
No Brain	Go! Go! Go!	That's Youth	PA0001673491

Artist/Performer	Track	Album	U.S. Copyright Office Registration Number
No Brain	No Idea	That's Youth	PA0001673491
No Brain	내일로 내일로 Tomorrow Tomorrow (feat. Koo	That's Youth	PA0001673491
No Brain	고마워 친구 Thank You, My Friend	That's Youth	PA0001673491
99 Anger	It's Not My Problem	Vol.2	PA0001673426
99 Anger	The Question : How You Use It	Vol.2	PA0001673426
99 Anger	The Answer	Vol.2	PA0001673426
99 Anger	Realistic = Unrealistic	Vol.2	PA0001673426
99 Anger	Stolen Home	Vol.2	PA0001673426
99 Anger	Music Brings Me Here	Vol.2	PA0001673426
99 Anger	Can I Have You Without Having You	Vol.2	PA0001673426
99 Anger	You, the Enemy	Vol.2	PA0001673426
99 Anger	Friends You've Killed	Vol.2	PA0001673426
99 Anger	Sick and Tired	Vol.2	PA0001673426
Huckleberry Finn	Time	Olympio Star	PA0001673505
Huckleberry Finn	I Know	Olympio Star	PA0001673505
Huckleberry Finn	물고기 Fish	Olympio Star	PA0001673505
Huckleberry Finn	연 Kate	Olympio Star	PA0001673505
Huckleberry Finn	Hey Come	Olympio Star	PA0001673505
Huckleberry Finn	불안한 영혼 Anxious Soul	Olympio Star	PA0001673505
Huckleberry Finn	K	Olympio Star	PA0001673505
Huckleberry Finn	올랭피오의 별 Olympio Star	Olympio Star	PA0001673505
Huckleberry Finn	춤추는 고양이 Dancing Cat	Olympio Star	PA0001673505
Huckleberry Finn	민요 Folk Song	Olympio Star	PA0001673505
Huckleberry Finn	자폐 Autism	Olympio Star	PA0001673505
Swallow	Show	It	PA0001673488
Swallow	두 사람 Two People	It	PA0001673488

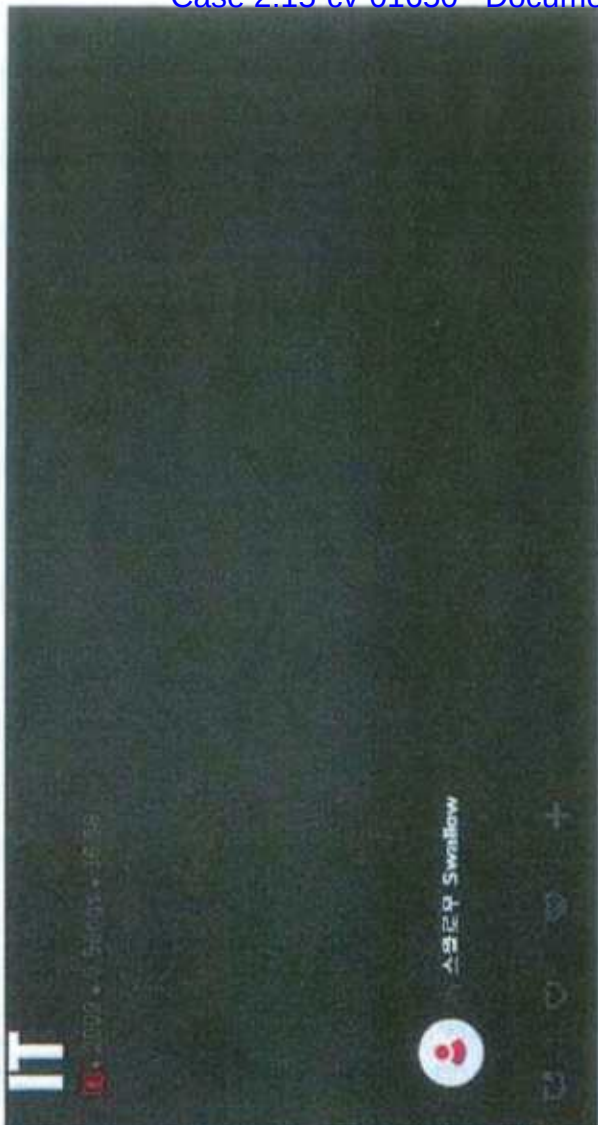
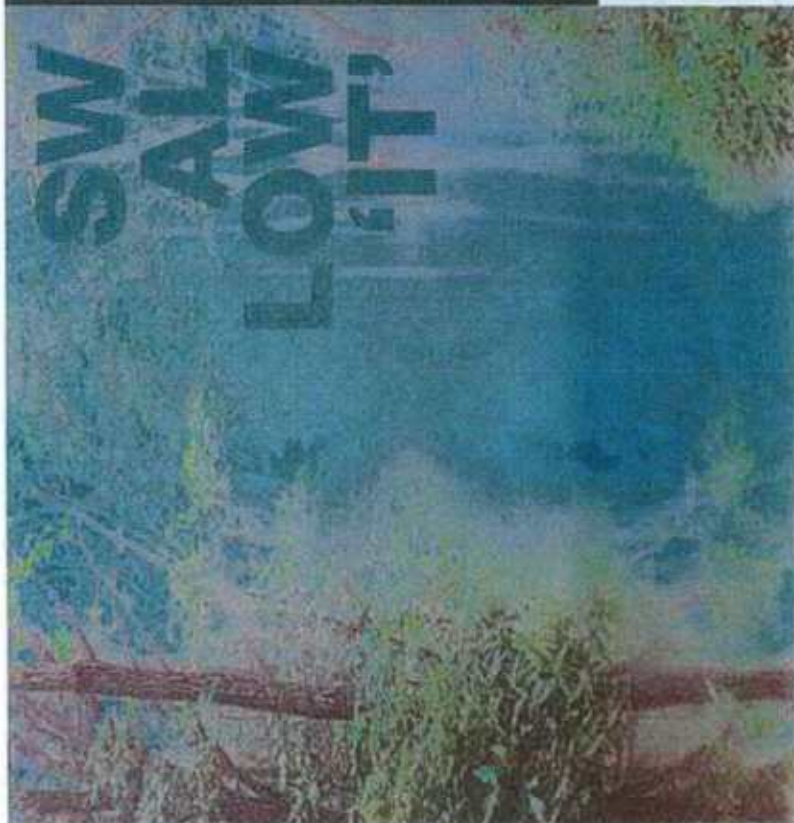
Artist/Performer	Track	Album	U.S. Copyright Office Registration Number
Swallow	It	It	PA0001673488
Swallow	The Giant	It	PA0001673488
Swallow	눈은다 Snow Falls	It	PA0001673488
Swallow	Hey You	It	PA0001673488
Swallow	하루 Day	It	PA0001673488
Swallow	나는 고요하다 I'm Silent	It	PA0001673488
Swallow	비늘 Scale	It	PA0001673488
Rhymebus	How Do You Want It (feat. 임정희 Lim Jeong-Hi)	Get On The Bus	PA0001673514
Rhymebus	I Like It	Get On The Bus	PA0001673514
Rhymebus	Skit	Get On The Bus	PA0001673514
Rhymebus	Love Game (feat. Nan-A)	Get On The Bus	PA0001673514
Rhymebus	조심해 Watch Out	Get On The Bus	PA0001673514
Rhymebus	It's Over (feat. 이도사 Lee Do-Sa, Leo & J)	Get On The Bus	PA0001673514
Rhymebus	Charming Girl	Get On The Bus	PA0001673514
Rhymebus	Love Game (Remix)	Get On The Bus	PA0001673514
Rhymebus	Where U At?	Get On The Bus	PA0001673514
Rhymebus	All Eyez On Me	Get On The Bus	PA0001673514

## **EXHIBIT 2**



Artist	Album Title	Track Titles	UPC	UPC Submitted by CJ E&M/ CJ E&M America	ISRC	ISRC Submitted by CJ E&M/ CJ E&M America
Rhymebus	Get On the Bus	How Do You Want It (feat. 임정희 Lim JeongHee)	8809259900534	888675178183	KRA350800574	KRA499811156
Rhymebus	Get On the Bus	I Like It			KRA350800575	KRA499811180
Rhymebus	Get On the Bus	Skit			KRA350800576	KRA499811772
Rhymebus	Get On the Bus	Love Game (feat. Nan-A)			KRA350800577	KRA499811402
Rhymebus	Get On the Bus	조심해 Watch Out			KRA350800581	KRA499808892
Rhymebus	Get On the Bus	It's Over (feat. 이도사 Lee DoSa, Leo & J)			KRA350800582	KRA499811280
Rhymebus	Get On the Bus	Charming Girl			KRA350800585	KRA499810826
Rhymebus	Get On the Bus	Love Game (Remix)			KRA350800586	KRA499811403
Rhymebus	Get On the Bus	Where U At?			KRA350800587	KRA499810657
Rhymebus	Get On the Bus	All Eyez On Me			KRA350800588	KRA499810697
Swallow	It	Show	8809259902446	8809231387032	KRA350902267	KRA490900587
Swallow	It	두 사람 Two People			KRA350902268	KRA490900588
Swallow	It	It			KRA350902269	KRA490900589
Swallow	It	The Giant			KRA350902270	KRA490900590
Swallow	It	눈은다 Snow Falls			KRA350902271	KRA490900591
Swallow	It	Hey You			KRA350902272	KRA490900592
Swallow	It	하루 Day			KRA350902273	KRA490900593
Swallow	It	나는 고요하다 I'm Silent			KRA350902274	KRA490900594
Swallow	It	비늘 Scale			KRA350902275	KRA490900595

# **EXHIBIT 3**



1	Show 스윙로우 Swallow
2	두사림 스윙로우 Swallow
3	It 스윙로우 Swallow
4	자이언트 스윙로우 Swallow
5	노론다 스윙로우 Swallow
6	Hey You 스윙로우 Swallow
7	함무 스윙로우 Swallow
8	나는고요하다 스윙로우 Swallow
9	베는 스윙로우 Swallow
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1	No.1	관람버스 Rhyme Bus
2	How Do U Want It	관람버스 Rhyme Bus
3	I Like It	관람버스 Rhyme Bus
4	Skitt	관람버스 Rhyme Bus
5	Luv Game	관람버스 Rhyme Bus
6	라이트를 켜라 (Turn The Lighter)	관람버스 Rhyme Bus
7	가시건과 베타박의 인간극장 (Gasakim And Beatpark's Humanity)	관람버스 Rhyme Bus
8	독백 (Feat. 홍관&영백스) (Monologue)	관람버스 Rhyme Bus
9	조심해 (Careful)	관람버스 Rhyme Bus
10	It's Over	관람버스 Rhyme Bus
11	Music Of My Life	관람버스 Rhyme Bus
12	무궁화 꽃이 피었습니다 (Mugonghwa Flower Has Blossom)	관람버스 Rhyme Bus
13	Charming Girl	관람버스 Rhyme Bus
14	Luv Game (Remix Ver.)	관람버스 Rhyme Bus
15	(Hidden Track) Where U At	관람버스 Rhyme Bus
16	All Eyes On Me	관람버스 Rhyme Bus